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Department of Environmental Quality
Division of Environmental Response And Remediation

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ERRC-154-02

EPA, REGION ZEE SUPFREUND BRANCH

July 22, 2002

Jim Christiansen U S Environmental Protection Agency, Region VIII 999 18th Street - Suite 300 Denver, CO 80202 - 2466

Re: Human Health Risk Assessment for Richardson Flat Site

Dear Mr. Christiansen:

Enclosed are our comments on the Draft Human Health Risk Assessment for Richardson Flat Site. If you have any questions, please contact me at (801)-536-4178.

Sincerely,

Muhammad A. Slam, Project Manager Department of Environmental Quality

Mylama JA. Slan

MAS/klv

Enclosure

UDEQ COMMENTS ON THE DRAFT BASELINE HUMAN HEALTH RISK ASSESSMENT RICHARDSON FLAT TAILINGS PARK CITY, SUMMIT COUNTY, UTAH (MAY 2002)

GENERAL COMMENTS:

The Table of contents does not include the Figures, Tables and Appendices. These may be included in the Table of Contents as a check for completeness. For example the report includes Figures 1-1 and 1-3. It is not clear to the reader if Figure 2-1 is missing or it is not part of the report..

SPECIFIC COMMENTS:

- 1. Page ES-2. Exposure Assessment. Please indicate that in some instances children may be considered a "High Intensity User" but for this risk assessment the exposure scenario for the High Intensity User does not consider children.
- 2. Page 2-3. Section 2.2.3.1 Impoundment integrity Analyses. Please replace the word "seUSEPAge" with the word that was intended.
- 3. Page 2-6. Section 2.4.3 Climate. The authors state "The average monthly temperature ranges from 19°F to 58°F with an average fro the year of 36°F." Is this accurate? If not, please provide the correct annual climate estimates.
- 4. Page 4-1. Section 4.1.3 Exposed Populations and Potential Exposure Scenarios. Please place a sentence like the first two sentences in this section in the Executive Summary section.
- 5. Page 5-10. Section 5.1.2.2.1 Inhalation of Particulates. There is no reference or information provided for how the PEF value was calculated, other than the Arizona Department of Health Services derived it. Please provide UDEQ the information that was used to calculate this value so that it UDEQ can determine if it is acceptable.